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UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:  
  
ALL ACTIONS  
  
\_\_\_\_\_

Case No. 3:23-md-03084-CRB

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF MOTION FOR  
ENFORCEMENT OF PROTECTIVE ORDER**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn declare as follows:

2 1. I am an attorney licensed to practice before all state and federal courts in California. I am  
3 an attorney at Kirkland & Ellis L.L.P., counsel of record for Defendants Uber Technologies, Inc., Raiser,  
4 LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer this Declaration in the above-  
5 captioned matter in support of Uber’s Motion for Enforcement of the Protective Order.

6 2. Attached as **Exhibit 1** is an article published by the New York Times, dated August 6,  
7 2025, titled, “Uber’s Festering Sexual Assault Problem.”

8 3. Attached as **Exhibit 2** is a true copy of the declaration of William Anderson, dated August  
9 12, 2025.

10 4. Attached as **Exhibit 3** is a true copy of the declaration of Christopher V. Cotton, dated  
11 August 12, 2025.

12 5. Attached as **Exhibit 4** is a true copy of the declaration of Randy Luskey, dated August 12,  
13 2025.

14 6. Attached as **Exhibit 5** is a true copy of the declaration of Louis W. Fisher, dated August  
15 12, 2025.

16 7. Attached as **Exhibit 6** is a true copy of the declaration of Kristen Fournier, dated August  
17 13, 2025.

18 8. Attached as **Exhibit 7** is a true copy of an email dated July 30, 2025, at 7:36 a.m., from  
19 Emily Steel to Uber personnel.

20 9. Attached as **Exhibit 8** is a true copy of the Protective Order dated December 28, 2023.

21 10. Attached as **Exhibit 9** is the Acknowledgment and Agreement to Be Bound, attached as  
22 Exhibit A to the Protective Order dated December 28, 2023.

23 11. Attached as **Exhibit 10** is the Stipulation and Amended Protective Order dated March 6,  
24 2025.

25 12. Attached as **Exhibit 11** is a true copy of the Transcript of Proceedings held before the  
26 Honorable Ethan P. Schulman on July 31, 2025.

27 13. Attached as **Exhibit 12** is a true copy of an email dated July 9, 2025, at 7:53 p.m., from  
28 Duffy Carolan to counsel for Uber.

1 I declare under penalty of perjury under the laws of the State of California and the laws of the  
2 United States of America that the foregoing is true and correct.

3 Dated: August 13, 2025

Respectfully submitted,

4  
5 By: /s/ Laura Vartain Horn  
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15 LLC; and RASIER-CA, LLC  
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